

Restrictions on open loop scrubber wash water discharge

This information is provided in good faith and for general guidance only. For most updated and definitive information, contact the local authorities.

Country	Port	Open loop EGCS discharge allowed?	Comments
Argentina	All	No	Lesmi & Moreno advise that Regulation No. 15/2020 of the Environment Protection Bureau, in force as of 10 August 2020 , prohibits the discharge of washwater from the exhaust gas cleaning systems (EGCS) of national or foreign-flagged vessels into Argentinean jurisdictional, sea or river waters.
Australia	All	Yes	According to AMSA Marine Notice 05/2019, wash water testing should be conducted upon commissioning of the EGCS and repeated every twelve months, as a minimum, for a period of two years. Ships may be directed not to discharge wash-water from an EGCS in Australian waters if this data, or evidence that samples have been taken for analysis, cannot be provided to AMSA before arrival at the first Australian port.
Bahrain	All	No	Open loop operation not allowed in port or at anchor
			Open loop operation is allowed in Bahraini territorial waters and exclusive economic zone (EEZ) as long as it can be proved that the discharge of washwater complies with MEPC.259(68) and there is no negative impact on marine ecosystems.
Belgium	All	No	Belgian federal law states discharge only allowed in coastal and open seawaters when at least 3nm off coast Discharges must not imperil EU Water Framework Directive objectives. Flemish regional law also confirms discharge not allowed in ports or inland waters.
Bermuda	All ports	Yes	The maximum allowed sulphur content in fuel for Controlled Plants is 2.0%. Ships equipped with Exhaust Gas Cleaning Systems (EGCS) shall seek the prior approval of the Environmental Authority before its use in Bermuda's territorial waters. Wash-water and residue from the EGCS shall be not disposed of in Bermuda or discharged into Bermuda's waters but shall be stored on board the ship until outside of Bermuda's waters.

Brazil	All (except Vale term Yes	Prior to 23 July 2020, advice received from local correspondents was “ based on existing provisions in national legislation, especially Law 9.966/00, the discharge of effluents generated by Scrubbers or Exhaust Gas Cleaning Systems (EGCS) is not allowed and the vessel, when in Brazilian waters, must operate with fuel within specifications (sulphur content up to 0.5% m/m)”.
		However, correspondents Brazmar advised on 23 July 2020 that the Directorate of Ports and Coasts (DPC) / Navy have changed their previous guidance on the topic, and that the discharge of wash water from open loop and/or hybrid Exhaust Gas Cleaning Systems (EGCS) is allowed within Brazilian Jurisdictional Waters until the competent environmental authority has the opportunity to better assess the scenario.
		This is under the assumption that the subject EGCS is approved by Class, has a plan for compliance of SOx emissions and is approved as per requirements of resolution MEPC.259 (68) of IMO.
Brazil	Vale ports and termii No	Vale instruct arriving vessels that the discharge of EGCS washwater is not allowed while operating in its Brazilian ports and terminals.
		Vale recommends that vessels should be changed over to compliant fuel before entering contiguous zone or coastal waters (24 nautical miles from coastline).
PR China	Inland river Emission No	China MSA guidance prohibits the discharge of water washings from open- loop scrubbers in certain areas. The prohibited areas are:
		Inland river Emission Control Areas (ECAs)
		Port areas within coastal ECAs
		Bohai Sea – the sea area within lines connecting the junction point of shorelines of Dandong, Dalian and shorelines of Yantai, Weihai.
		The guidelines also prohibit the incineration of the water washing residues from any type of exhaust gas scrubber. Ships are required to keep accurate records of the stowage and disposal of the washing washings.
		If a vessel is not able to store the washing water it is required to switch to low sulphur fuel (not exceeding 0.5%) prior to entering the above areas. The guidelines also state that under certain circumstances a vessel may apply for an exemption if it uses fuel that does not meet the MSA’s requirements.
		A copy of the MSA’s guidelines for ships operating within the ECAs, including enforcement details can be found here.

Egypt	All ports and Suez Canal	No	Suez Canal:
			Suez Canal Authority has issued Circular 08/2019. Clarification on this circular is provided here
			The authority puts no conditions or restrictions on marine fuels until Egypt ratifies MARPOL Annex VI – as such, sulphur cap is not in force.
			Wash water from open-loop scrubbers is not permitted to be discharged during transit of the canal
			Egyptian Ports:
			Kalimbassieris Maritime Egypt advise that the discharge of open loop scrubber washwater is not permitted in Egyptian territorial waters
Estonia	All Ports	Restricted	Refer to paragraph 10.1.6.1 of MEPC 184(59) and the restrictions on discharging chemical EGCS wash water including enclosed ports and estuaries. Exceptions for discharge into the sea are made if the ship operator can demonstrate that the washing water meets international requirements, required PH levels and does not cause adverse effects on human health or the environment. Prior authorisation is always required to discharge into the port area. The water Act which entered into force on 01.10.2019 does not treat washing water discharges as a violation of pollutant discharge from ships, if in compliance with MARPOL. The use of closed-loop EGCS is permitted in the territorial waters and ports of Estonia, if it meets the relevant requirements and is certified, however discharging of the washing water is not permitted.

Germany	Inland Waterways , canals and ports within inland waterways	No	EGCS discharge is not permitted according to the convention on the collection, deposit and reception of waste generated during navigation on the Rhine and other inland waterways (CDNI Convention) .Restrictions apply to all inland waterways intended for general traffic except for the German part of Lake Constance and the stretch of the Rhine upstream of Rheinfelden.
Gibraltar	Gibraltar	No	Closed loop scrubbers are permitted in Gibraltar waters, Hybrid scrubbers operating in closed loop mode are also permitted, and open loop scrubber are temporarily not permitted as a precautionary measure until the Gibraltar Government arrives at a definitive policy decision with regards to (solely) open loop scrubbers
Hong Kong	All Hong Kong	Yes	A ban on EGCS wastewater is not listed, however Hong Kong regulation L.N 135 of 2018 states that an exemption from use of non-compliant fuel is granted if the authorities are satisfied with the abatement technology used to reduce sulphur dioxide emissions. More detail on this and the duration of exemption can be found by accessing the document via link below. https://www.elegislation.gov.hk/hk/2018/ln135!en
Ireland	Dublin and Waterford	No	Refer to Port of Dublin's NOTICE TO MARINERS No. 37 of 2018 Prohibition on the Discharge of Exhaust Gas Scrubber Wash Water http://www.dublinport.ie/wp-content/uploads/2018/06/37-2018-Prohibition-on-the-Discharge-of-Exhaust-Gas-Scrubber-Wash-Water.pdf Port of Waterford weblink http://www.portofwaterford.com/news/marine-notices-prohibition-on-the-discharge-of-exhaust-gas-scrubber-wash-wa
Latvia	All Ports	Conflicting advice	EUROPEAN COMMISSION REPORT (2016): Allowed – no restrictions, but national authorities are of the position that open-loop scrubber discharge should be prohibited in territorial waters and ports ABS Report (2018): Prohibited in port waters Correspondents Pandi Balt Ltd advised in August 2018 that washwater discharges currently allowed under regulations but likely to be prohibited in future

Lithuania	All Ports	Conflicting advice	EUROPEAN COMMISSION REPORT (2016): Allowed – no restrictions (in accordance with IMO Washwater Guidelines MEPC 184(59)). ABS Report (2018): Prohibited in territorial waters and ports We understand Lithuanian authorities are studying whether EGCS wash water discharges have serious impacts on the marine environment or not. When results will be clear, conclusions will be provided.
Malaysia	All Ports	No	Malaysia shipping notice MSN 07/2019 prohibits the use of open loop scrubbers within 12 nautical miles from land. Vessels calling at Malaysian ports must operate in closed loop mode or change over to compliant fuel before arrival.MSN072019 (2).pdf
Norway	The World Heritage Fjords sea areas of Geirangerfjord and Nærøyfjord	Restricted	The World Heritage Fjords sea areas of Geirangerfjord and Nærøyfjord restrict the use of open loop scrubbers, but not closed loop.Section 14b of the relevant Norwegian Maritime Authority’s regulation can be accessed at the link below. https://www.sdir.no/en/shipping/legislation/directives/amendments-to-the-regulations-on-environmental-safety-for-ships-and-mobile-offshore-units/
Oman	All	No	Open-loop scrubber discharge is not permitted in Oman territorial waters
Pakistan	Port of Karachi and Port Bin Qasim	No	The Government of Pakistan Ministry of Maritime Affairs (Ports and Shipping) circular number 001/2020 prohibits the discharge of wash-water from open loop scrubbers. If closed loop scrubbers are not in use then compliant fuel should be used and changed over before arriving in port waters.

			NT NOTICE TO SHIPPING No. N-1-2020 “Vessel Requirements”, Section 31 states the following and can be accessed here The use of open loop scrubbers or hybrid scrubbers in open loop mode is prohibited in Panama Canal waters. Vessels opting to use closed loop scrubbers or hybrid scrubbers in closed/ zero discharge mode shall submit documents to the panama-canal authority as detailed in section 31 E. Additionally, Section 28 (5) of the same document states: “Residues from the Exhaust Gas Cleaning System (EGCS) wash-water are to be collected on board. Discharging these residues into the water bodies under the responsibility of the Panama Canal or incinerating them on board is not permitted.”
Panama	Panama canal	No	
Portugal	All Ports	No	Use of open loop scrubbers are not allowed from entry of the ship into the port, along the port channel and at berth (moored), until the ship leaves the port. Only closed loop operation is allowed.
Saudi Arabi:	All Ports	No	Saudi Port Authorities have now banned exhaust wash water discharges from open loop EGCS systems in Saudi ports until an environmental standard is issued in this regard.
Singapore	Singapore	No	Ban on the use of open loop scrubbers expected to take effect on 1 January 2020
Spain	Algeciras, Cartagena, Huelva	No	Use of open loop scrubbers is prohibited at the Spanish ports of Algeciras, Cartagena and Huelva. At present no other Spanish ports have imposed this ban.
Sweden	Stockholm, Trelleborg and Petroport, Stenungsund	No	Whilst there is no nationwide ban in Swedish waters on the use of open loop scrubbers, some ports have placed local restrictions:
			Stockholm – Advise that there is an open loop scrubber ban in Stockholm

			Trelleborg – Chalmers University in Gothenburg advise of ban of open loop scrubbers in port of Trelleborg. See section 29 of the Swedish language version of the Trelleborg port regulations (https://www.trelleborgshamn.se/wp-content/uploads/2020/01/Hamnordning-G%C3%A4llande-fr%C3%A5n-1-januari-2020.pdf).
			Petroport, Stenungsund – See section 12 of harbour regulations which state “Vessels calling at the Port are not allowed to use Open-loop System for scrubbers”.
United States	Californian Ports and Waters	No	The Californian ARB OGV regulations stipulate only distillate fuels can be used to comply with the 0.1% sulphur limit Changeover to compliant distillate fuel (MGO or MDO) prior to entering Californian waters
United States	Connecticut Ports and Waters	No	Discharge of exhaust gas scrubber washwater into Connecticut waters from any vessel is prohibited VGP 2013: 6.5.9 Discharge of exhaust gas scrubber washwater into Connecticut waters from any vessel covered under the VGP or sVGP is prohibited. This condition is necessary for compliance with CGS section 22a-427, Standards No.1, 2, 9, 12, 14, 15, and 24 of the CT WQS.
United States	Hawaii Ports and Waters	Yes – conditional	Additional requirements under VGP 2013 Section 6.6. The State of Hawaii (Clean Water Branch) issued ‘Blanket Section 401’ Water Quality Criteria (WQC). This covers 27 categories of effluent discharge from an applicable vessel (EGCS washwater being one) that have received the best control or treatment into waters of the State of Hawaii incidental to the normal operation of the applicable vessels
United Arab Emirates	Abu Dhabi Ports	Yes – conditional	Abu Dhabi Ports Company Policy: Sludge generated from exhaust gas scrubber washwater discharge must not be discharged into port waters.

Exhaust gas scrubber washwater discharge may only be discharged in port waters if free from pollutants.

Any exhaust gas scrubber sludge should be discharged from a vessel to an ADPC licensed waste disposal contractor http://www.adports.ae/wp-content/uploads/2017/01/20131003_Vessel-Discharge-Draft-C.pdf

United

Arab

Emirates Fujairah

No

Notice to Mariners No. 252 from Port Fujairah prohibits use of open loop scrubbers in its waters

*The above informations are callated from various websites for easy reference

